

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,
AND EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00473-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**

I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of Dell's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., and EMC Corporation ("Dell") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I also understand that WSOU has accused Dell EMC SmartFabric OS10 ("Accused Products") of infringement.

5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area

since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, I understand that Dell employees working in Santa Clara, CA may report to superiors in Austin, Texas. For example, Stefan Bokaie (a Dell employee with knowledge of the Accused Products working in Santa Clara, California) reports to a manager located in Austin, Texas. I also understand that financial, sales, and marketing relating to the Accused Products are managed in Austin / Round Rock, Texas.

7. Aside from the employees located in the Austin Division, Dell has additional employees with knowledge of the Accused Products located in Santa Clara, California. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, the following employees, located outside of the Western District of Texas, have responsibility relating to the Accused Products.

Name	Title	Place of Business
Stefan Bokaie	VP Product Development, Networking	Santa Clara, CA
Joseph White	Senior Distinguished Engineer	Santa Clara, CA

8. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have determined that Dell has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020



Kellie Crantz
Vice President, Human Resources
Dell Technologies Inc.